



## YAVAPAI COUNTY EDUCATION SERVICE AGENCY

*The First Choice for Responsive Educational Services*

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Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554

July 23, 2019

Dear Chairman Pai,

The FCC's proposal to adopt an overall cap on the USF is unfortunate, counterproductive, and contrary to congressional intent. Congress directed the FCC to make "sufficient" funding available to meet our nation's universal service goals, not to prohibit spending that is necessary to reach those goals. I urge the commission to focus its energies on more pressing issues, such as solving the homework gap, Wi-Fi on school buses, and fixing the vast problems with E-rate. The overall cap on USF is unneeded, and unwarranted.

The Yavapai County Education Service Agency (YCESA) provides central administration and support to 26 school districts, 24 charter schools, and approximately 1,100 home school students throughout rural Arizona. Our county has approximately 26,000 students with over 59,000 families residing a county that covers the same square mileage as the state of New Jersey.

Arizona ranks 48 in spending per pupil, so our shared service model is extremely important in order to provide as many opportunities to as many students as possible. E-Rate service is one of those shared services that the YCESA not only to Yavapai County, but to the entire state of Arizona. In three years, our agency has become the largest service provider to schools and libraries throughout the state with over 80 clients. We know firsthand how much this overall cap will cause an even further digital divide throughout our entire state.

Personally, I have seen the FCC move in a positive direction over the last six years with the switch to bring in more dollars from digital carriers instead of just phone carriers and the approval of more Category 2 funding. These changes have paid huge dividends to our schools. The biggest change we were able to capitalize on was the recent broadband initiative. When the FCC offered to pay for 90% of the costs to bring high speed internet to schools and libraries if our state kicked in the remaining 10%, our county jumped on the opportunity. The result was \$1.8MIL of funding to finally bring a basic utility to over 76 schools and libraries to our county. Not only has this provided an extremely valuable resource to our children and teachers, it has given us the ability to expand our emergency services and bring telemedicine out to our most rural locations...ultimately saving lives!!!

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role is the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

In closing, I reiterate my continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "T. Carter". The signature is fluid and cursive, with a large initial "T" and a stylized "Carter".

Tim Carter  
Yavapai County School Superintendent